

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

BCS SOFTWARE, LLC,

Plaintiff

v.

CODELATHE TECHNOLOGIES,
INC.

Defendant

Case No. 6:21-cv-0027-ADA

PLAINTIFF'S ANSWER TO COUNTERCLAIMS

By and through its undesignated counsel, Plaintiff BCS Software, LLC (“BCS”) hereby respectfully answers Defendant Codelathe Technologies, Inc.’s Counterclaims as follows:

COUNTERCLAIM 1:

SECTION 101 INVALIDITY

1. Denied.
2. Denied.
3. Denied.

COUNTERCLAIM 2:

**SECTIONS 102 AND 103 INVALIDITY: LOTUS
NOTES**

4. Denied.
5. Denied.

6. Admits that the web pages cited by Defendant make reference to Will Crowther, Colossal Cave Adventure, a DEC PDP-10 computer, Roy Trubshaw and MUD (Multi-User Dungeon) but denies the remaining allegations set forth therein.

7. Plaintiff is without sufficient information to either admit or deny the allegations in this paragraph, and, therefore, denies the allegations set forth therein.

8. Denied.

9. Denied.

10. Denied.

11. Denied.

COUNTERCLAIM 3:

SECTIONS 102 AND 103 INVALIDITY: MICROSOFT SHAREPOINT 2001

12. Admits that the web pages cited by Defendant reference Microsoft SharePoint 2001. Denies the remaining allegations in this paragraph.

13. Admits that Exhibit A is a copy of a document which references Windows SharePoint Services (WSPS). Denies the remaining allegations in this paragraph.

Dated: March 11, 2021

Respectfully submitted,

/s/ Thomas Fasone III

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